

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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**UNITED STATES OF AMERICA,**

**v.**

**SUNRISE LEE**

**Defendant.**

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**Criminal No: 16-10343-ADB**

**DEFENDANT LEE’S RENEWED MOTION TO CONTINUE SENTENCING**

NOW COMES the Defendant, Sunrise Lee, through counsel, and hereby renews her motion to continue her sentencing for all the reasons set forth in her previously filed Motion to Continue Sentencing, [Doc. 1086]. In support thereof, counsel states the following:

1. The Court has never ruled on the merits of Doc. 1086.<sup>1</sup>
2. Following the filing of Doc. 1086, the Court did continue the Defendant’s sentencing from January 8, 2020 to January 22, 2020, to allow additional time for all defendants to file responses to the Government’s restitution submissions.
3. Counsel has been recently advised that despite the additional time, the Defendant’s PSR will not be updated to include her prior interview, conducted on October 27, 2019, or medical and social service records not already received by probation.

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<sup>1</sup> Today, the Court issued an Order [Doc. 1116] in which it inferred that the issue raised in Doc. 1086 may be moot. The issue is not moot as set forth above.

4. Further, counsel has been advised that the Defendant will not be re-interviewed and no additional requests for social service or medical records will be requested.
5. The Government has repeatedly objected to Doc. 1086.

WHEREFORE, this Honorable Court is respectfully urged to continue the Defendant's sentencing until such a time a proper and complete PSR can be prepared.

Respectfully Submitted,



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#### **CERTIFICATE OF SERVICE**

I, Peter Charles Horstmann, Esquire hereby certify that a copy of the instant motion was filed through the ECF system and served upon all counsel of record including the United States through its representatives AUSAs Nathaniel Yeager, Fred Wyshak and David Lazarus, 1 Courthouse Way, Boston, MA 02110 on January 6, 2020.



Peter Charles Horstmann, Esq.